

ORIGINAL

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JUN 07 2001

MARY E. DIANDREA,  
Per *JK* DEPUTY CLERK

June 6, 2001

Re: Civil Action No. 1:CV-01-130  
Workinger v. William J. Henderson, U.S. Postal Service

On April 13, 2001, Defendant filed a motion for more definite statement. It is hereby requested that such motion be opposed. Defendant demanded more definite statement in July, 1999 which was answered previously and again on August 3, 1999 by recapitulating the multiple employment torts committed by Defendant's representatives. Therefore, no good purpose would be served by repeating findings of fact already in the record.

The terms of the alleged probationary employment are not specified nor relevant in this matter. Any alleged probations would not excuse Defendant from satisfying collective bargaining unit's agreements and obligations as set forth prior to this matter.

The Court may, if deemed necessary and appropriate, appoint and order counsel for Plaintiff under applicable jurisdictional law to properly preserve procedural integrity in this matter. At the least, Defendant should be directed to specify which averments it considers "unclear and confusing."

Wherefore, Plaintiff prays that the United States District Court for the Middle District of Pennsylvania provide all applicable remedies available under the titles relevant to this matter.

Sincerely and respectfully submitted,

*George S. Workinger*  
(Plaintiff)